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5 ATTORNEYS FOR DEFENDANT, THE ROMAN CATHOLIC  
BISHOP OF OAKLAND, A CORPORATION SOLE  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10

11 Travelers Casualty and Surety ) Case No. C 05 0915 BZ  
Company, )  
12 ) **STIPULATION AND**  
Plaintiff, ) **ORDER TO STAY ACTION**  
13 )  
v. )  
14 )  
The Roman Catholic Bishop of )  
15 Oakland, a Corporation Sole, )  
16 Defendant. )  
17  
18

19 Plaintiff, TRAVELERS CASUALTY AND SURETY COMPANY  
20 ("TRAVELERS") and defendant THE ROMAN CATHOLIC BISHOP OF  
21 OAKLAND, a Corporation Sole ("the DIOCESE") (collectively  
22 "the parties") by and through their attorneys of record  
23 identified below hereby enter into the following  
24 Stipulation to Stay Action:

25 WHEREAS, there are multiple related, pending actions  
26 filed by individuals against the DIOCESE;

27 WHEREAS, since at least February 2005, under the  
28 oversight of Judge Ronald Sabraw with the Alameda Superior

1 Court, these cases against the DIOCESE have been the  
2 subject of extensive settlement negotiations;

3 WHEREAS, as part of an ongoing mediation process, Judge  
4 David Hunter of the Alameda Superior Court has been and is  
5 actively meeting with the parties in the underlying cases  
6 in an effort to resolve those cases;

7 WHEREAS, if the underlying suits settle, this  
8 litigation may prove unnecessary; and

9 WHEREAS, staying this action for three months will give  
10 the underlying actions a reasonable amount of additional  
11 time to settle, after which time this case can proceed, if  
12 necessary.

13 NOW, THEREFORE, IT IS HEREBY AGREED, STIPULATED AND  
14 ORDERED THAT:

15 1. All proceedings in this action shall be stayed  
16 until October 13, 2005. All previously set dates shall be  
17 taken off calendar, including the case management  
18 conference scheduled for July 13, 2005.

19 2. The parties' last day to serve their initial  
20 disclosures pursuant to Rule 26(a)(1) and to file and serve  
21 their discovery plan pursuant to Rule 26(f) shall be  
22 **October 31, 2005.**

23 3. A case management conference shall be held on  
24 Wednesday, November 9, 2005 at 3:00 p.m. The parties shall  
25 meet and confer prior to the conference and shall prepare a  
26 a joint Case Management Conference Statement which shall be  
27 filed no later than ten (10) days prior to the Case  
28 Management Conference. Plaintiff shall be responsible for

1 filing the statement as well as for arranging the conference  
2 call. All parties shall be on the line and shall call (510)  
3 637-3559 at the above indicated date and time.

4  
5 Dated: July 8, 2005

DRINKER, BIDDLE & REATH LLP

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7 By: /s/ Charles A. Reid

8 CHARLES A. REID  
9 Attorneys for Plaintiff,  
Travelers Casualty and  
10 Surety Company

11 Dated: July 8, 2005

FOLEY & LARDNER LLP  
Stephen A. McFeely  
Robert C. Leventhal  
Jose-Manuel A. de Castro

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13  
14  
15 By: /s/ Robert C. Leventhal

16 Robert C. Leventhal  
17 Attorneys for Defendant,  
The Roman Catholic Bishop  
of Oakland, a Corporation  
18 Sole

19 **CERTIFICATION**

20 I attest that Charles A. Reid concurs in the filing of  
21 this Amended Stipulation and [Proposed] Order to Stay  
22 Action.

23  
24 IT IS SO ORDERED.



25  
26 DATED: 7-12-05

27 /s/ Saundra Brown Armstrong  
28 THE HON. SAUNDRA BROWN ARMSTRONG